

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

LEROY WILLIAMS BEY®

Plaintiff

v

CHILD PROTECTIVE SERVICES,  
SHAWNA MILLER AND CYNTHIA  
MARTIN, HUSBAND AND WIFE,  
AND THE MARITAL COMMUNITY  
THEREOF,

HARBORVIEW HOSPITAL, DR.  
NAOMI SUGAR, HUSBAND AND  
WIFE, AND THE MARITAL  
COMMUNITY THEREOF

CHILDRENS HOSPITAL, DR.  
DENISE SHUSHAN, HUSBAND  
and WIFE, AND THE MARITAL  
COMMUNITY COMPOSED THEREOF,

SWEDISH HOSPITAL, DR. VICKI  
SAKATA, HUSBAND AND WIFE, AND  
THE MARITAL COMMUNITY COM -  
POSED THEREOF,

CHILDRENS HOSPITAL, SOCIAL  
WORKER MEI LING ELLIS,  
HUSBAND AND WIFE, AND THE  
MARITAL COMMUNITY COMPOSED  
THEREOF,

SEATTLE POLIC DEPARTMENT,  
POLICE OFFICERS CHRIS YOUNG,  
ERIK JOHNSON, AMBER ANDERSON,  
JAMES SATHER, JEFF JOHNSON,  
JAMES BULAWA, DONALD GEORGE,  
JON EMERICK, RANDALL HIGA,  
JOEL GINGREY, SHELLY SAN  
MIGUEL, JASON HOPPERS, TIM  
OWENS, AND ANGELA GORDAN,  
HUSBAND AND WIFE, AND THE  
MARITAL COMMUNITY COMPOSED  
THEREOF,

ON GOING DEFENDANTS,

CIVIL RIGHTS COMPLAINT  
BY A PRISONER UNDER 42  
U.S.C. § 1983

**CV13 812** MJP



13-CV-00812-CMP

SNOHOMISH COUNTY SHERIFF'S  
DEPARTMENT, FORENSIC ENTER-  
VIEW SPECIALIST, ASHLEY  
WILSKE, HUSBAND AND WIFE,  
and THE MARITAL COMMUNITY  
composed THEREOF,

WESTERN STATE HOSPITAL, DR.  
GALLAHGER, HUSBAN AND WIFE,  
AND THE MARITAL COMMUNITY  
composed THEREOF,

WESTERN STATE HOSPITAL, DR.  
STEINWEINDER, HUSBAND AND  
WIFE, AND THE MARITAL  
COMMUNITY COMPOSED THEREOF,

ALL CITY BAILS BOND, TROY  
HANSEN, HUSBAND AND WIFE,  
and THE MARITAL COMMUNITY  
COMPOSED THEREOF,

ALIYA HASHEMI, MICHAEL WILLIAMS  
CHRIS GIBSON, MELEAH GIBSON,  
CLAIRE GILCHIRST, AND DAVID  
JACKSON, HUSBAND AND WIFE,  
AND THE MARITAL COMMUNITY  
COMPOSED THEREOF,

ATORNEYS JAMES BIBLE, KATHRYN  
BECKERMAN, CHRISTOPHER SWABY,  
AND JULIE A. KAYS, HUSBAND  
AND WIFE, AND THE MARITAL  
COMMUNITY COMPOSED THEREOF,

KING COUNTY CORRECTIONAL  
FACILITY, SEATTLE, JOHN DOE  
AND JANE DOE, HUSBAND AND  
WIFE, AND THE MARITAL  
COMMUNITY COMPOSED THEREOF,

JUDGES GREG CANOVA, HELEN  
HALPERT, GLENNA HALL, JULIE  
SPECTOR, DEAN S. LUM, MICHAEL  
J. TRICKEY, CHERYL CAREY AND  
ROBERT S. LASNIK, HUSBAND AND  
WIFE, AND THE MARITAL COM-  
MUNITY COMPOSED THEREOF,

CONTINUED

DEPARTMENT OF SOCIAL AND HEALTH  
SERVICES, JANE DOE AND JOHN DOE  
HUSBAND AND WIFE, AND MARITAL  
COMMUNITY COMPOSED THEREOF,

DEFENDANTS, BEING SUED IN  
THEIR INDIVIDUAL PERSONS

## PARTIES

### PLAINTIFF

1. Plaintiff has been biological parent of LEROY WILLIAMS BEY AND LEON WILLIAMS BEY, form birth to 6-15-2007 to present.

### DEFENDANTS

2. The Seattle Police was called and sent to plaintiff home, by Aliya Hashemi. Plaintiff was laying down on his couch at home, while plaintiff children was sitting at kitchen table doing homework. When the Seattle Police removed screen from window and start playing with the plaintiff children. Plaintiff told Leon to quit playing and do his homework or he was going to get a beating. Plaintiff hit Leon twice with the belt and went to lay back down on the couch, when there was a loud knock at the door. Plaintiff open door and it was the Seattle Police. One of the Police Officer said he had something to show me, we walk around to the side of the house, where he showed me where he removed the screen and opened the window. I asked him why was he looking through my window. His reply was you are going to jail the plaintiff said what are the charges, Police Officer said give me a while and I will think of some. This happened on 6-15-2007, this is when the Seattle Police beat and kidnapped the plaintiff children. Evidence of this was shown to plaintiff on 8-3-2009, by Officer of the Court Christopher Swaby. The bruises on Leon leg will be permanent marks, that was done intentionally with malice and hate, no one hit children like that but the European and Klu Klux Klan. From that date mentioned the Seattle Police, interfered with the plaintiff and plaintiff children civil rights, under color of law. Noing and willingly subjected the plaintiff and the plaintiff children to the depredation of their rights, immunities secured by the United States Constitution and 18 U.S.C. § 241, 242, and 1001.

3. The conspiracy continued, when Judge Greg Conova, Prosecutor Julie A. Kays, Public Defenders James Bible and Karthryn Beckerman, signed contracts to have plaintiff unlawfully incarcerated, for none appearance, No Bond Warrant. Then Judge Greg Canova, Prosecutor Julie A. Kays, Public Defenders James Bible and Kartrryn Beckerman signed contracts to force plaintiff to go to Western State Hospital, to be beaten and forced to take drugs against plaintiff will, or power of attorney. During the plaintiff unlawful incarceration, the plaintiff was denied to go to court concerning plaintiff children. This was done to plaintiff because the plaintiff filed a 28 U.S.C. § 1441, because the lower court violated treaty and speedy trial rights. The District Court has original Jurisdiction when constitutional issue's are involved. Judge Greg Canova, Prosecutor Julie A. Kays and Public Defender James and King County Correctional Facility Mail Room Clerk, conspired to severe Legal Mail sent by plaintiff to U.S. District Court from King County Correctional Facility. They noing and willingly under color of law, deprived plaintiff and plaintiff children of their rights, immunities, secured by and protected by the United States Constitution and United States Codws 18 U.S.C. § 241, 242, 1700, 1701, 1702, 1703, 1709 and 1710.

4. Judge Richard A. Jones recuses himself from all matter of this case, but passed on to Judge Robert S. Lasnik, who help continue the conspiracy against plaintiff, until he remand cases back to Superior Court, which Judge Greg Canova did not have any Jurisdiction to issue a no Bond Warrant or Order to show cause for issuance of Warrant. Judge Robert S. Lasnik, noing and will-ingly deprived the plaintiff under color of law, depravaton of rights, immunuties, secured and protected by the United States Constitution and United States Code 18 U.S.C. § 241 and 242.

5. Department of Social and Health Services, John Doe and Jane Doe and their employees, took part in the conspiracy to interfere with plaintiff and plaintiff children Civil Rights, under color of law, noing and willingly deprived the plaintiff and plaintiff children of their rights, immunities, secured and protected by the United States Constitution, due process, by kidnapping plaintiff children and concealing them in the State of Washington, also in violation of Washington State Laws and United Codes 18 U.S.C. § 241, 242 and 1983.

6. Shawna Miller and Cynthia Martin of Child Protective Servies, aided and abetted in the conspiracy of the kidnapping of the plaintiff children, under color of law, noing and willingly subject plaintiff and plaintiff children to the depravation of their rights, immunities, secured and protected by the United States Constitution and United States Sode 18 U.S.C. § 241, 242, 1001, and 1201.

7. Troy Hansen of All City Bails Bond, aided and abetted in the kidnapping and unlawfull incarceration of plaintiff, under color of law, deprived plaintiff of rights, immunities, secured and protected by the United States Constitution and United State Codes 18 U.S.C. 241, 242, 1001, and 1201.

8. Christopher Swaby also aided and abetted in the kidnap-ping of plaintiff and plaintiff children, under color of law no-ing and willingly deprived prived plaintiff and plaintiff children of their rights, immunities, secured and protected by the United States Constitution and United States Codes 18 U.S.C. 241, 242, 1001, 1201, 1700, 1701, 1702, 1703, 1709 1710. When he said he forgot to bring papers for plaintiff appeal to Court with him but drop them off at King County Correctional Facility, to be filed by plaintiff. Plaintiff filed out appeal paper's and mail them from King County Correctional Facility to United States Court of Appeals Division 1, which they never received.

9. Dr. Steinweinder and Dr. Gallagher who aided and abett-ed in the kidnapping of plaintiff and plaintiff children. Dr. Steinweinder who prescribed medication, that was forced on plaintiff against plaintiff will. The medication subscribed by Dr. Steinweinder, could have caused diabetes, brain damage or death to the plaintiff, which mentioned in court. Dr. Steinweinder and Gallagher gave authority to staff at Western State Hospital to beat and force drugs on plaintiff, which was sanctioned by Judge Greg Canova, Prosecutor Julie A. Kays, Public Defender's James Bible and Kathryn Beckerman, who all acted under color of law, noing and willingly deprived the plaintiff of rights, immunities secured and protected by the United States Constitution and United States Codes, 18 U.S.C. § 241, 242, 1001, 1201 and 1983.

10. Aliya Hashemi, Michael Williams, Chris Gibson, Me-leah Gibson, Claire Gilchirst and David Jackson, who aided and abetted the State of Washington in the kidnapping of plaintiff and plaintiff children, under color of law, in the deprivation of their rights, immunities, secured by the United States Constitution and United States Codes, 18 U.S.C. § 241, 242, 1001, and 1201.

11. All Judges herein noing and willingly, under color of law deprived the plaintiff and plaintiff children their rights, immunities, secured by the United State Constitution and United States Codes, 18 U.S.C. 241, 242, and 1201.

12. This conspiracy deprived plaintiff and plaintiff children of Due Process of Law.



## **JURISDICTION**

1. This court has jurisdiction over plaintiff conspiracy claims for the fallacious unconstitutional acts committed under color of law, under 42 U.S.C. § 1981 and 1983.

2. This court has jurisdiction over plaintiff claims pursuant to 42 U.S.C. 1983, 28 U.S.C. 1343, 28 U.S.C. 1331 and 1331, and 28 U.S.C. 1367, where the actions complained of was commenced in State Court, under color of law, in violation of plaintiff and plaintiff children constitutional right and immunities.

3. Defendant named herein are actionable under 1981, 1983 1985 and 1986 Civil Rights Violation arising out of the kidnapping of plaintiff children and concealment of them in the State of Washington, from plaintiff and the conspiracy by high ranking officials to prevent disclosure of the kidnapping and concealment, from the plaintiff.

4. The plaintiff may recover damages under 1985(2) of the Civil Rights Acts which prohibits conspiracies, to interfere with Civil Rights.

5. The infringement upon the plaintiff and plaintiff children Constitutional Protected Liberties in the continued association, with out due process of law, is actionable under 1983 for the unlawful breach by the defendant's named herein, of that relationship by virtue of their separation.

6. This court has jurisdiction over the plaintiff claim under 1983, where plaintiff says and deposes defendant's conspired to deprive the plaintiff and plaintiff children of their Federal Protected Due Process Rights of access to the courts, being violation of the sue and give evidence clause of section 1981 and 1985(3), which create cause of action against conspiracies designed to deprive the plaintiff and plaintiff children of the equal protection of the laws and equal privileges and immunities under the law.

## **CONSTITUTIONAL RIGHTS VIOLATED**

### **1. AMENDMENT 1**

Congress shall make no law respecting an established of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the people peaceable to assemble, and to petition the government for a redress of grievances.

2. AMENDMENT IV

The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrant shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the the place to be searched, and the person or things to be seized.

3. AMENDMENT V

No person shall be deprived of life, liberty, or property without due process of law, nor shall private property be taken for public use, without just compensation.

4. AMENDMENT VI

The accused shall enjoy the right to be informed of the nature and cause of the accusation; to be confronted with the witness against him; to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense.

5. AMENDMENT VIII

Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted.

6. Article I Section X

No state shall enter into any treaty, alliance, or confederation; grant letters of marque and reprisal; coin money; emit bills of credit; make anything but gold and silver coin a tender in payment of debts; pass any bill of attainder, ex post facto law, or law impairing the obligation of contracts, or grant any title of nobility.

7. ARTICL III

The judicial powers of the United States, shall be vested in one Supreme Court, and in such inferior courts as the Congress may from time to time ordain and established. The judges both of the supreme and inferior courts, shall hold their office during good behavior, and shall, at stated times, receive for their services, a compensation, which shall not be deminished during their continuance in office.

8. ARTICLE VI

This Constitution, and the laws of the United States which shall be made in pursuance thereof; and all treaties made, or which shall be made, under the authority of the United States shall be the supreme law of the land; and the judges in every state shall be bound thereby, anything in the Constitution or laws of any state to the contrary notwithstanding.

**FEDERAL STATUES VIOLATION**

1. Provisions of the Adoption Assistance Act which is contained in Sub-Chapter IV of the Social Security Act and establishes a cooperative Federal-State program under the Federal Government providing funding for children Welfare Program too.

2. 42 U.S.C.A. § 1981, 1985(3), 1985(2)

3. Violation of 42 U.S.C.A. 622(b) and 627(a)(b) of subchapter IV-B entitled Child Welfare Services.

4. Violation of 42 U.S.C.A. 671(a) of subchapter IV-E entitled Federal Payment for Foster Care and Adoption Assistance.

5. Violation of Social Security Act, 471(a).

6. Violation 18 U.S.C. § 241, 242 and 1001.

7. Violation of 16 U.S.C. § 1201.

8. Violation of 42 U.S.C. 1985 conspiracy to interfere with civil rights.

9. Violation of Amendment VI, right to speedy trial.

10. Dafamation, subornation of perjury, obstruction of Governmental and Judicial Administration, bribery and tampering with witnesses, tampering with evidence, initiating false reports and other violations of State and Federal Law based on facts noted above.

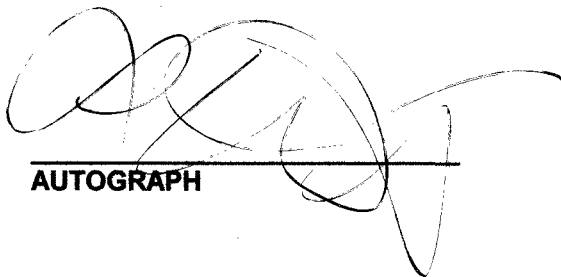
11. The plaintiff and plaintiff children civil rights has been infringed upon, under color of law and depriving them and their family of association and their god given birth rights subjecting them to a life of uncertainty and peril!



**RELEIF SOUGHT**

**I want the return of my children and releif as follows:**

1. Warrant's and arrests for Seattle Police, witnesses herein who committed perjury...
2. General Damages in the amount of \$100,000,000.00.
3. Specail damages in the amount of \$100,000,000.00.
4. Punitive Damages in the amount of \$100,000,000.00.
5. Compensatory Damages in the amount of \$300,000,000.00.
6. Any other releif that the Judge deems appropriate.



A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

**AUTOGRAPH**

4-21-2013  
**DATE**

7. LEROY WILLIAMS BEY AND LEON WILLIAMS BEY, plaintiff is the parent of both children and sole supporter.

I Affirm under penalty of perjury under the laws of the United States of America that the above information is true and correct.

  
\_\_\_\_\_  
LEROY BEY

4-21-2013  
DATE

CIVIL RIGHTS ACTION

PAGE 2

**united STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

**1. STATEMENT OF THE FACTS**

**NO.**

False evidence and statements given by the Seattle Police who are named herein, false statements given by the witnesses makes the case invalid and Null In Void. Denial of evidence to the accused, by the Judge, Prosecutor and Lawyer violates Washington State Constitution and united States Constitution, which is also stated within. The case is invalid and releif should be granted.

**STATEMENT OF THE FACTS**

RECEIVED  
3 APR 24 AM 10:32  
M. L. HATCHER, CLK  
U.S. BANKRUPTCY COURT  
W.D. OF WA AT SEATTLE

BY \_\_\_\_\_ **CV13 812** mjp

FILED ENTERED  
LODGED RECEIVED

APR 25 2013 JS

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY

united STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

CIVIL RIGHTS ACTION PURSUANT TO  
42 U.S.C. 1983

LEROY WILLIAMS EL BEY  
POST OFFICE BOX 1680  
MARYSVILLE, WASHINGTON [98270]

STATUS: COMMON LAW, IN SPECIAL APPEARANCE, IN PROPRIA PERSONA,  
SUI JURIS

CIVIL RIHGTS ACTION

**united STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

**CIVIL RIGHTS ACTION PURSUANT TO  
42 U.S.C. 1983**

**LEROY WILLIAMS EL BEY  
POST OFFICE BOX 1680  
MARYSVILLE, WASHINGTON [98270]**

**STATUS: COMMON LAW, IN SPECIAL APPEARANCE, IN PROPRIA PERSONA,  
SUI JURIS**

**CIVIL RIHGTS ACTION**

united STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTO

LEROY WILLIAMS

PLAINTIFF

VERSUS

STATE OF WASHINGTON

DEFENDANT

NO.

DECLARATION AND APPLICATION TO  
PROCEED IN FORMA PAUPERIS IN  
COMMON LAW U.N. PROJECT #215/93  
BRINGING A CIVIL RIGHTS ACTION  
PURSUANT TO 42 U.S.C. 1983

CLERK'S ACTION REQUIRED

I affirm, declare I am entitled to proceeding; in support of my request to proceed under 28 U.S.C. 1915, I affirm I am unable to pay full filing fees or give security for it; and I am entitled to relief.

1.An order of indigency is herein.

AUTHORITY

In any court of the united States may authorize the commencement, prosecution or defense of any suit, action or proceeding, civil or criminal, or appeal thereof, by a petitioner who makes a affidavitt that the petitioner is unable to pay cost, without payment of fees and cost, or security thereof U.S.C.A. 1915 (a)(f).

2013

This Date

*April*

day of 21

APPLICATION TO PROCEED IN FORMA PAUPERIS



In support of this application, plaintiff answer the following the following questions under penalty of perjury.

1. LEROY WILLIAMS EL BEY  
POST OFFICE BOX 1680  
MARYSVILLIE, WASHINGTON [98270]
2. Are you currently employed? No
3. In the past 12 months have received any money from any of the following sources?
  - a. Busines profession or other self employment? No
  - b. Rent payments, interest or dividends? No
  - c. Pension, annuities or life insurance payments? No
  - d. Disability or workers compensation payments? No
  - e. Gifts or inheritances? No
  - f. Any other sources?No
4. Do you have any cash or do you have any money in checking or savings account? No
5. Do you own any real estate, bonds, securities, other financial instruments, automobiles or other valuable property? No
6. Do you have any other assets? No
7. List the persons who depends on you for support, state your resonsibility to each person and enter how much you contribute to their support.

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
OFFICE OF THE CLERK

WILLIAM M. McCOOL  
CLERK

700 STEWART ST  
SEATTLE, WA 98101

April 29, 2013

Leroy Williams El Bey  
Post Office Box 1680  
Marysville, WA 98270

To Leroy William El Bey:

The court received the following correspondence on 4/25/2013:

*Civil Rights Complaint and Declaration and Application to Proceed In Forma Pauperis*

The Application is not the court issued form. Also, you did not submit a Civil Cover Sheet which is required when filing a case in this district. Enclosed you will find:

*Civil Cover Sheet and Court issued Declaration and Application to Proceed IFP*

Please return the enclosed documents by **May 29, 2013**. At that time a case number and judge will be assigned.

Thank you.